

# **EXHIBIT 46**

**From:** [Murphy, Michael D.](#)  
**To:** [Beral, Arash](#); [Malynn, Todd M.](#)  
**Cc:** [Zollicoffer, Jordan](#)  
**Subject:** Draft - Joint Statement re Contempt Negotiations April 8, 2025(170475866.1)  
**Date:** Tuesday, April 8, 2025 11:03:15 AM  
**Attachments:** [Draft - Joint Statement re Contempt Negotiations April 8, 2025\(170475866.1\)-C.docx](#)

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Arash:

Please include the statement supporting your position here. Please get it to me by 11:50.  
I will make no reference to it nor change our position based upon it.

We will file as is, with, as exhibits: our invoices, and Erik Agaki's invoices.

Thanks

Fox Logo



Michael Murphy

Partner

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6 Attorneys for Plaintiff SHAKEY'S  
7 PIZZA ASIA VENTURES, INC.

8  
9 **UNITED STATES DISTRICT COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 SHAKEY'S PIZZA ASIA VENTURES,  
12 INC, a Philippines corporation,

13 Plaintiff,

14 v.

15 PCJV USA, LLC, a Delaware limited  
liability company; PCI TRADING,  
16 LLC, a Delaware limited liability  
company; GUY KOREN, an individual;  
17 POTATO CORNER LA GROUP, LLC,  
a California limited liability company;  
18 NKM CAPITAL GROUP, LLC, a  
California limited liability company; J &  
19 K AMERICANA, LLC, a California  
limited liability company; J&K  
20 LAKEWOOD, LLC, a California  
limited liability company; J&K  
21 VALLEY FAIR, LLC, a California  
limited liability company; J & K  
22 ONTARIO, LLC, a California limited  
liability company; HLK MILPITAS,  
23 LLC, a California, limited liability  
company; GK CERRITOS, LLC, a  
24 California, limited liability company;  
J&K PC TRUCKS, LLC, a California  
25 limited liability company; and, GK  
CAPITAL GROUP, LLC, a California  
26 limited liability company and DOES 1  
through 100, inclusive,

27 Defendants.  
28

Case No. 2:24-CV-04546-SB(AGRx)

*Hon. Stanley Blumenfeld*

**JOINT STATUS REPORT OF  
PLAINTIFF AND DEFENDANTS  
REGARDING ONGOING MEET  
AND CONFER DISCUSSIONS**

Complaint Filed: May 31, 2024  
Trial Date: August 4, 2025

1 PCJV USA, LLC, a Delaware limited  
2 liability company; PCI TRADING LLC,  
3 a Delaware limited liability company;  
4 POTATO CORNER LA GROUP LLC,  
5 a California limited liability company;  
6 GK CAPITAL GROUP, LLC, a  
7 California limited liability company;  
8 NKM CAPITAL GROUP LLC, a  
9 California limited liability company; and  
10 GUY KOREN, an individual,

11 Counter-Claimants,

12 v.

13 SHAKEY'S PIZZA ASIA VENTURES,  
14 INC, a Philippines corporation,

15 Counter Defendant.

16 PCJV USA, LLC, a Delaware limited  
17 liability company; PCI TRADING LLC,  
18 a Delaware limited liability company;  
19 POTATO CORNER LA GROUP LLC,  
20 a California limited liability company;  
21 GK CAPITAL GROUP, LLC, a  
22 California limited liability company;  
23 NKM CAPITAL GROUP LLC, a  
24 California limited liability company; and  
25 GUY KOREN, an individual,

26 Third Party Plaintiffs,

27 v.

28 PC INTERNATIONAL PTE LTD., a  
Singapore business entity; SPAVI  
INTERNATIONAL USA, INC., a  
California corporation; CINCO  
CORPORATION, a Philippines  
corporation; and DOES 1 through 10,  
inclusive,

Third Party Defendants.

1 Pursuant to this Court's Orders of March 25, 2025 (Dkt. 135), Plaintiff  
2 Shakey's Pizza Asia Ventures, Inc. ("SPAVI" or "Plaintiff") and Defendants PCJV  
3 USA, LLC and Guy Koren (collectively, "Defendants") submit the following Joint  
4 Statement, regarding their ongoing meet and confer efforts to resolve (1) "any  
5 outstanding violations of the Court's preliminary injunction," and (2) "the amount  
6 of reasonable attorney's fees to award to Plaintiff in connection with its contempt  
7 motion." Because the parties were not able to come to an agreement, each presents  
8 its 3-page statement of position, as expressed below.

9 **PLAINTIFF'S STATEMENT**

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11 **DEFENDANTS' STATEMENT**

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14  
15 Dated: April 8, 2025

**FOX ROTHSCHILD LLP**

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Michael D. Murphy  
Jordan Zollicoffer  
19 Attorneys for Plaintiff SHAKEY'S  
20 PIZZA ASIA VENTURES, INC.

21  
22 Dated: April 8, 2025

**BLANK ROME LLP**

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Arash Beral  
26 Todd Malynn  
27 Victor Sandoval  
28 Attorneys for Defendants

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**CERTIFICATE OF SERVICE**

The undersigned certifies that, on April 8, 2025, the foregoing document was electronically filed with the Clerk of the Court for the United States District Court, Central District of California, using the Court's ECF filing system. I further certify that all counsel for all parties to this action are registered CM/ECF user and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: April 8, 2025

**FOX ROTHSCHILD LLP**

/s/ Michael D. Murphy

Michael D. Murphy  
Attorneys for Plaintiff SHAKEY'S  
PIZZA ASIA VENTURES, INC.